

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

/

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND BY 14 DAYS
(UNTIL MAY 21) TO FILE POST-TRIAL MOTIONS**

Defendant was convicted on April 23, 2024. His post-trial motions are currently due on May 7, 2024. See Rule 29, 33 and 34, Federal Rules of Criminal Procedure. Defendant is moving this court for an 14-day extension of time because undersigned counsel (Srebnick) has a May 1, 2024, deadline to finalize and file a 20,000-word brief in the U.S. Court of Appeals in *U.S. v. Dermen*, 23-4074 (10th Cir.), in which the defendant-appellant is in custody, and the Court has advised that no extensions will be granted absent “extraordinary circumstances.” Undersigned also has a May 1, 2024, deadline to file objections to the PSI and a sentencing memorandum in *U.S. v. Sheppard*, 22-20290-CR-BB, but is requesting, without objection, that such deadline be extended by eight days, until May 9, 2024.

Government counsel advised that they have no objection to this motion.

Accordingly, Defendant Polit asks the Court to extend the current deadline by 14 days, until May 21, 2024, to file post-trial motions.

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